

IN THE UNITED STATES DISTRICT COURT  
FOR NORTHERN DISTRICT OF IOWA  
(Eastern Division)

MARK LOUIS BRANDES, SR.,

Plaintiffs,

v.

CITY OF WATERLOO, IOWA and  
STEVE HOAMBRECKER,

Defendants.

Case No. 6:18-cv-2089

**NOTICE OF REMOVAL**

COME NOW Defendants City of Waterloo, Iowa and Steve Hoambrecker, (hereinafter “Defendants”) by and through their attorneys, Redfern, Mason, Larsen & Moore, PLC, pursuant to 28 U.S.C. § 1441 and file this Notice of Removal of an action pending in the Black Hawk County District Court (hereinafter “State Court”), and in support thereof state as follows:

1. On October 12, 2018, an action was commenced in the Black Hawk County District Court of the State of Iowa, entitled Mark Louis Brandes, Sr. v. City of Waterloo, Iowa and Steve Hoambrecker, Case No. LACV 135909. A Petition of the State Court matter and Affidavits of Return of Service are attached.
2. Defendants were served by personal service on October 22, 2018.
3. The above entitled action is a civil action of which this Court has original jurisdiction pursuant to 28 U.S.C. § 1331, and it is an action which may be removed to this Court pursuant to 28 U.S.C. § 1441, in that Plaintiff’s Petition in the State Court action includes allegations of violations of 29 C.F.R. § 825.220 (FMLA) and 42 U.S.C. § 12112 (ADA).
4. The Defendants have attached hereto copies of all process, pleadings, and orders served upon the Defendants in the State Court action.

5. Written notice of the filing of this Notice of Removal will be given to the Plaintiff and a copy of this Notice of Removal and supporting papers will be filed with the Clerk of the State Court pursuant to 28 U.S.C. § 1446(d).

WHEREFORE the Defendants pray that the above described action pending in State Court be removed to this Court.

Respectfully submitted,

REDFERN, MASON, LARSEN & MOORE, P.L.C.

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*Attorneys for Defendants*

#### PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein by electronically filing this document on the EDMS system.

REDFERN, MASON, LARSEN & MOORE, P.L.C.

By Barbara A. Hoytman